

# Exhibit 3

Chart of MSP Deposition Responses from Steve Beatty, Narcisa Morris, and Brenda Hoffman Showing SORA's Vagueness

| QUESTIONS  | BEATTY  | MORRIS   | HOFFMAN  |
|--|---|--|--|
| <b>Phone Reporting</b>                               |   |  |  |
| <b>Past-Used Phones</b>                              | Must report only current and future phone usage. <sup>1</sup>                                   | Must report only phone numbers in use; historical numbers not required. <sup>2</sup>                         | All phone numbers must be reported, including those used in the past. <sup>3</sup>                               |
| <b>Temporary Usage</b>                               | Must report all usage, including friend's cell or unassigned work landline. <sup>4</sup>        | Unsure if there is a minimum amount of time/usage that triggers reporting. <sup>5</sup>                      | Implies temporary numbers should be reported. <sup>6</sup>   |
| <b>Phone Usage</b><br>(Google Voice or Spotify apps) | N/A   | Unsure which services are reportable; would not advise registrants on whether to register apps. <sup>7</sup> | Unsure what "using" means; does not know if using apps triggers reporting. <sup>8</sup>                          |
| <b>Vehicle Reporting</b>                             |   |  |  |
| <b>Past-Used Vehicles</b>                            | Do not have to report vehicles owned or operated in the past. <sup>9</sup>                      | N/A  | Past-used vehicles are subject to registration. <sup>10</sup>  |
| <b>Rental Cars</b>                                   | Must report rental cars or short-term Zipcar rentals. <sup>11</sup>                             | Unsure if rental cars must be reported. Cannot determine what registrants must report. <sup>12</sup>         | Per statute, every such use of a car needs to be reported. <sup>13</sup>   |
| <b>Operating Non-Owned Cars</b>                      | Must report all used vehicles, including friend's car or backhoe in construction. <sup>14</sup> | Will accept <i>any</i> reporting related to owned or operated vehicles. <sup>15</sup>                        | Unsure what "operate" means; turning on neighbor's car without moving may be subject to reporting. <sup>16</sup> |
| <b>Employment Reporting</b>                          |   |  |  |
| <b>Different Job Sites</b>                           | Must report different job sites. Floater must report each job site. <sup>17</sup>               | Do not need to report different job sites. Only report main site, even if floater. <sup>18</sup>             | N/A  |
| <b>Employment Layoffs</b>                            | Unsure if reportable; unsure if layoffs qualify as discontinued employment. <sup>19</sup>       | Must report layoffs (and when resume working). <sup>20</sup>   | N/A  |
| <b>Ad-hoc &amp; Odd Jobs</b>                         | N/A   | Must be reported if self-employment; unsure what is self-employment. <sup>21</sup>                           | Must be reported. Shoveling driveway for \$5 counts. <sup>22</sup>   |

| QUESTIONS                               | BEATTY   | MORRIS   | HOFFMAN   |
|---|--|--|---|
| <b>Volunteer Reporting</b>              |  |  |   |
| <b>Volunteer Work Must be Reported?</b> | Unsure. Contradiction between Explanation of Duties form (required) & SORA statute (not required); confused registrants should check with an attorney. <sup>23</sup>     | All “volunteerism” must be reported regardless of time frames or conditions. <sup>24</sup>                                       | Agrees that volunteer service must be reported e.g., helping neighbor for free could be problematic due to reporting. <sup>25</sup> |
| <b>What is Volunteer Work?</b>          | Not aware of MSP having a definition for volunteer work; unsure what is volunteer work (shoveling neighbor’s driveway, mowing lawn or helping with taxes). <sup>26</sup> | Can include one-time volunteer events (soup kitchen). Unsure what is considered “volunteerism”. <sup>27</sup>                    | Shoveling a neighbor’s driveway for free would be reportable. <sup>28</sup>   |
| <b>Address Reporting</b>                |  |  |   |
| <b>Temporary Housing</b>                | EOD form allows for reporting temporary addresses. <sup>29</sup>   | Unsure what qualifies; unsure if 7 days transforms place into temporary residence. <sup>30</sup>                                 | N/A   |
| <b>Spending Nights Elsewhere</b>        | Cannot answer without referring to statute. <sup>31</sup>  | Must report if staying elsewhere for over seven days or “laying their head there most of the time.” <sup>32</sup>                | N/A   |
| <b>Who Qualifies as Homeless</b>        | Unsure who qualifies as homeless without referring to the statute. <sup>33</sup>   | People who report that they are homeless, even if couch surfing, unless they stay more than 7 days. <sup>34</sup>                | N/A   |
| <b>Email/Internet Reporting</b>         |  |  |   |
| <b>Report IP Address?</b>               | Unsure if registrants need to report an IP address; unsure if considered an internet identifier. <sup>35</sup>   | EOD form does not require reporting IP address; unsure registrant would know if they have to report an IP address. <sup>36</sup> | N/A   |
| <b>Defining Internet Identifiers</b>    | Unsure if an Amazon or Zoom account is an “internet identifier” triggering reporting. <sup>37</sup>  | Would not advise individuals on whether online accounts (e.g., banking) are reportable as internet identifiers. <sup>38</sup>    | N/A   |

| QUESTIONS                  | BEATTY  | MORRIS  | HOFFMAN |
|----------------------------|---|---|---------|
| <b>Education Reporting</b> |   |   |         |
| <b>Community Classes</b>   | Unsure if taking taekwondo class at a community center would be reportable. <sup>39</sup> | Unsure if taekwondo class at a community center or college would be reportable. <sup>40</sup> | N/A     |

## Endnotes

<sup>1</sup> Beatty Dep., Ex. 71, at 127, 132.

<sup>2</sup> Morris Dep., Ex. 78, at 215.

<sup>3</sup> Hoffman Dep., Ex. 73, at 123-24.

<sup>4</sup> Beatty Dep., Ex. 71, at 132.

<sup>5</sup> Morris Dep., Ex. 78, at 215.

<sup>6</sup> Hoffman Dep., Ex. 73, at 126-27.

<sup>7</sup> Morris Dep., Ex. 78, at 216.

<sup>8</sup> Hoffman Dep., Ex. 73, at 127.

<sup>9</sup> Beatty Dep., Ex. 71, at 124-27.

<sup>10</sup> Hoffman Dep., Ex. 73, at 125.

<sup>11</sup> Beatty Dep., Ex. 71, at 127-28.

<sup>12</sup> Morris Dep., Ex. 78, at 217.

<sup>13</sup> *See* Hoffman Dep., Ex. 73, at 125.

<sup>14</sup> Beatty Dep., Ex. 71, at 128.

<sup>15</sup> Morris Dep., Ex. 78, at 217.

<sup>16</sup> Hoffman Dep., Ex. 73, at 128-30.

<sup>17</sup> Beatty Dep., Ex. 71, at 122-23.

<sup>18</sup> Morris Dep., Ex. 78, at 211-12.

<sup>19</sup> Beatty Dep., Ex. 71, at 123-24.

<sup>20</sup> Morris Dep., Ex. 78, at 212.

<sup>21</sup> *Id.* at 212-13.

<sup>22</sup> Hoffman Dep., Ex. 73, at 130.

<sup>23</sup> Beatty Dep., Ex. 71, at 116-21

<sup>24</sup> Morris Dep., Ex. 78, at 208, 213-14.

<sup>25</sup> Hoffman Dep., Ex. 73, at 134.

<sup>26</sup> Beatty Dep., Ex. 71, at 120-21

<sup>27</sup> Morris Dep., Ex. 78, 47-49, 213-15.

<sup>28</sup> Hoffman Dep., Ex. 73, at 134.

<sup>29</sup> Beatty Dep., Ex. 71, at 54.

<sup>30</sup> Morris Dep., Ex. 78, at 210.

<sup>31</sup> Beatty Dep., Ex. 71, at 131.

<sup>32</sup> Morris Dep., Ex. 78, at 208-09.

<sup>33</sup> Beatty Dep., Ex. 71, at 131.

<sup>34</sup> Morris Dep., Ex. 78, at 210.

<sup>35</sup> Beatty Dep., Ex. 71, at 129-130.

<sup>36</sup> Morris Dep., Ex. 78, at 100-01.

<sup>37</sup> Beatty Dep., Ex. 71, at 130-31.

<sup>38</sup> Morris Dep., Ex. 78, at 217.

<sup>39</sup> Beatty Dep., Ex. 71, at 133.

<sup>40</sup> Morris Dep., Ex. 78, at 219.